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December 15, 2022

Hon. Vernon S. Broderick, USDJ Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Re: Soto v. Triumph Construction Corp. et al. Docket No.: 21-cv-02449-VSB

Dear Judge Broderick,

I represent Plaintiff in the above action. Counsel for the parties jointly ask for one more extension of time from today until Tuesday, Dec. 20, 2022. There is no prejudice to any party and all prior requests have been granted for good cause.

The parties have fully executed the settlement agreement. We also have a final version of the Cheeks motion, which needs Defendants' review and approval. I undertook the laboring oar to draft the Cheeks motion. Because of my illness (the flu), I submitted the motion today. Alas, one of the defense counsel is presently out of office and, as a result, they need a few days to review the motion. They advise that Tuesday, December 20, is the earliest date by which they can do it.

Consequently, counsel for the parties beg the Court's indulgence and request an extension of time until December 20, 2022.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski